## Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Transcontinental Gas Pipe Line Corporation Compressor Station 175 Facility Name: Facility Location: 1344 Transco Road Scottsville, Virginia Registration Number: 40789 Permit Number VRO40789 February 5, 2007 Effective Date February 4, 2012 **Expiration Date** Regional Director, Valley Region Signature Date

Table of Contents, 2 page Permit Conditions, 25 pages

## **Table of Contents**

I.	FACILITY INFORMATION	4
II.	EMISSION UNITS	5
	COMPRESSOR ENGINE (EMISSION UNIT ID M01-M04) AND EMERGENCY WER GENERATOR (UNIT ID EMER01) REQUIREMENTS	
A.	LIMITATIONS	6
B.	RECORDKEEPING AND MONITORING.	
C.	TESTING	
IV.	NO <sub>X</sub> SIP CALL PHASE II REQUIREMENTS (EMISSION UNIT ID M01-M04).	9
A.	PURPOSE	9
B.	DEFINITIONS	9
C.	CONDITIONS	. 11
V.	INSIGNIFICANT EMISSION UNITS	. 16
VI.	PERMIT SHIELD & INAPPLICABLE REQUIREMENTS	.17
VII	GENERAL CONDITIONS	.18
A.	FEDERAL ENFORCEABILITY	. 18
B.	PERMIT EXPIRATION	. 18
C.	RECORDKEEPING AND REPORTING	
D.	ANNUAL COMPLIANCE CERTIFICATION	20
E.	PERMIT DEVIATION REPORTING	.21
F.	FAILURE/MALFUNCTION REPORTING	.21
G.	SEVERABILITY	. 22
H.	DUTY TO COMPLY	. 22
I.	NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	. 22
J.	PERMIT MODIFICATION.	
K.	PROPERTY RIGHTS	. 23
L.	DUTY TO SUBMIT INFORMATION	
M.	DUTY TO PAY PERMIT FEES	
N.	FUGITIVE DUST EMISSION STANDARDS	
O.	,	
Р.	ALTERNATIVE OPERATING SCENARIOS.	
Q.	INSPECTION AND ENTRY REQUIREMENTS	
R.	REOPENING FOR CAUSE.	
S.	PERMIT AVAILABILITY	
Т.	Transfer of Permits	
U.	MALFUNCTION AS AN AFFIRMATIVE DEFENSE	
V.	PERMIT REVOCATION OR TERMINATION FOR CAUSE	
	DUTY TO SUPPLEMENT OR CORRECT APPLICATION	
Χ.	STRATOSPHERIC OZONE PROTECTION	
Y.	ASBESTOS REQUIREMENTS	
Z.	ACCIDENTAL RELEASE PREVENTION	. 28

Compressor Station 175 Permit Number: VRO40789

Page	3
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AA. CHANGES TO PERMITS FOR EMISSIONS TRADING	28
BB. EMISSIONS TRADING	28

Permit Number: VRO40789

Page 4

## I. Facility Information

#### Permittee

Transcontinental Gas Pipe Line Corporation P.O. Box 1396 Houston, Texas 77251-1396

#### Responsible Official

Mark Bisett

Manager, Environmental Compliance

#### **Facility**

Compressor Station 175 Transcontinental Gas Pipe Line Corporation 1344 Transco Road Scottsville, Virginia 24590

#### Contact Person

Michael C. Callegari Senior Environmental Scientist (713) 215-4584

**County-Plant Identification Number:** 51-065-0016

**Facility Description:** NAICS 048621– Natural Gas Transmission

Transco is an interstate natural gas transmission company. Transco's 1,900-mile pipeline system transports natural gas from production areas in the Gulf Coast region to customers along the eastern seaboard. Transco's compressor stations are used to compress and move the gas along the system. Gas compression at this facility is made possible through the operation of four Cooper-Bessemer LSV-16SG natural gas-fired internal combustion engines and their associated compressors.

The facility is a Title V major source of  $NO_x$ , VOC, and CO. The source is located in an attainment area for all pollutants, and is a major source based on its potential to emit. The facility is an existing source.

## **II. Emission Units**

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burnii	ıg Equipn	nent					
M01	001	Cooper-Bessemer LSV-16SG Internal Combustion Reciprocating Engine, Rated at 4400 Hp. Constructed before 1972.	37 MM Btu/hr				1/30/07**
M02	002	Cooper-Bessemer LSV-16SG Internal Combustion Reciprocating Engine, Rated at 4400 Hp. Constructed before 1972.	37 MM Btu/hr				1/30/07**
M03	003	Cooper-Bessemer LSV-16SG Internal Combustion Reciprocating Engine, Rated at 4400 Hp. Constructed before 1972.	37 MM Btu/hr	-			1/30/07**
M04	004	Cooper-Bessemer LSV-16SG Internal Combustion Reciprocating Engine, Rated at 4400 Hp. Constructed before 1972.	37 MM Btu/hr				1/30/07**
EMER01	005	Ingersoll Rand PSVG-8 Natural Gas Internal Combustion Reciprocating Emergency Electric Power Generator. Constructed before 1972.	5.5 MM Btu/hr				N/A

<sup>\*</sup>The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
\*\*NO<sub>x</sub> SIP Call Phase II State Operating Permit

# III. Compressor Engine (Emission Unit ID M01-M04) and Emergency Power Generator (Unit ID EMER01) Requirements

#### A. Limitations

1. Sulfur dioxide emissions from the operation of compressor engines (M01-M04) and the emergency power generator (EMER01) shall not exceed 2.64K pounds per hour per unit, where K equals the actual heat input at total capacity expressed in Btu x 10<sup>6</sup> per hour.

(9 VAC 5-80-110 and 9 VAC 5-40-280 B)

2. No owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than twenty (20) percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed sixty (60) percent opacity. Failure to meet the opacity requirement because of the presence of water vapor shall not be a violation. This standard is applicable to each compressor engine at the facility.

(9 VAC 5-80-110 and 9 VAC 5-40-80)

3. The approved fuel for compressor engines (M01-M04) and the emergency power generator (EMER01) is pipeline quality natural gas. A change in fuels may require a permit to modify and operate.

(9 VAC 5-80-110 B.1)

4. At all times, including periods of startup, shutdown and malfunction, the permitee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions.

(9 VAC 5-80-110 and 9 VAC 5-40-20 E)

5. The emergency power generator (EMER01) is to be operated for emergency use, for routine testing, and for maintenance purposes. The emergency power generator may be operated for 50 hours per year in non emergency situations. There are no time limits on emergency and testing use. Any changes in use may require a permit or permit revision.

(9 VAC 5-80-110)

Page 7

Except where this permit is more restrictive, Units M01-M04 and EMER01 shall comply with the requirements of 40 CFR Part 63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) no later than June 15, 2007.
 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110, 40 CFR 63 Subpart ZZZZ)

## B. Recordkeeping and Monitoring

- 1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:
  - a. Monthly records that include the monthly and annual consumption of natural gas fuel, in cubic feet, for each compressor engine (M01-M04) and the emergency power generator (EMER01). The annual throughput shall be calculated as the sum of each consecutive twelve (12) month period.
  - b. Annual hours of operation of the emergency power generator (EMER01), including the reason for operation, for emergency use the type of emergency must be listed, calculated monthly as the sum of each consecutive twelve (12) month period for each emergency and non-emergency use.
  - c. Records of malfunctions of equipment which would cause a violation of any part of this permit.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.

(9 VAC 5-80-110 F)

2. Determination of whether acceptable operating and maintenance procedures are being used by the permittee will be based on information available to the DEQ, which may include, but is not limited to, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-80-110 and 9 VAC 5-40-20 E)

Page 8

## C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9 VAC 5-40-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
NO <sub>x</sub>	EPA Method 7 or 7E
$SO_2$	EPA Method 6
Visible Emissions	EPA Method 9

(9 VAC 5-80-110)

Permit Number: VRO40789

Page 9

## IV. NO<sub>x</sub> SIP Call Phase II Requirements (Emission Unit ID M01-M04)

The following conditions are incorporated from the NO<sub>x</sub> SIP Call Phase II State Operating Permit. The owners and operators of the source shall comply with the standard requirements and special provisions set forth in the application.

#### A. Purpose

- 1. Addressing the interstate transport of ozone and implementing ozone season emission reduction measures that will address the significant contribution to downwind ozone nonattainment by imposing certain federally enforceable conditions; and
- 2. Establishing requirements for the reduction of nitrogen oxide (NO<sub>x</sub>) emissions during the ozone season from Transcontinental Gas Pipe Line Corporation Compressor Station Number 175 located in Fluvanna County. These requirements shall be the legal and regulatory basis for control of NO<sub>x</sub> emissions from this facility.

#### **B.** Definitions

- 1. <u>Affected Engine</u> means any stationary IC engine that is a Large NO<sub>x</sub> SIP Call Engine, or other stationary IC engine that is subject to NO<sub>x</sub> emission reduction requirements under this permit.
- 2. **Board** or **SAPCB** means the State Air Pollution Control Board, a citizen board of the Commonwealth of Virginia described in § 10.1-1301 of the Code.
- 3. Clean Air Act (CAA) means 42 USC 7401 et seq.
- 4. **Code** means the Code of Virginia.
- 5. **<u>DEQ</u>** means the Department of Environmental Quality, an agency of the Commonwealth described in § 10.1-1183 of the Code.
- 6. **EPA** or **the administrator** means the United States Environmental Protection Agency.
- 7. <u>Large  $NO_x$  SIP Call Engine</u> means a stationary IC engine identified and designated as "large" in the  $NO_x$  SIP Call Engine Inventory as emitting more than one ton of  $NO_x$  per average ozone season day in 1995.

- 8. New Source Review (NSR) Program means a preconstruction review and permit program (i) for a new stationary sources or modifications (physical changes or changes in the method of operation) to existing ones, (ii) established to implement the requirements of §§ 110 (a)(2)(C), 112 (relating to permits for hazardous air pollutants), 165 (relating to permits in prevention of significant deterioration areas), and 173 (relating to permits in nonattainment areas) of the federal Clean Air Act and associated regulations, and (iii) promulgated as Article 6 (9 VAC 5-80-1100 et seq.), Article 7 (9 VAC 5-80-1400 et seq.), Article 8 (9 VAC 5-80-1605 et seq.) and Article 9 (9 VAC 5-80-2000 et seq.) of Part II of 9 VAC 5 Chapter 80 of the SAPCB Regulations.
- 9.  $\underline{NO_x}$  means nitrogen oxides as defined by 9 VAC 5-10-20 of the SAPCB Regulations
- 10. <u>Ozone Season</u> means the period of time from May 1 to September 30 of any calendar year.
- 11. Past NO<sub>x</sub> Emission Rate means the emission rate of an affected engine in pounds per hour (lb/hr) as determined by performance testing consistent with the requirements of 40 CFR Part 60, Appendix A. Where such performance test data are not available, the Past NO<sub>x</sub> Emission Rate may be determined by the State on a case-by-case basis using, for example, appropriate emission factors or data from the NO<sub>x</sub> SIP Call Engine Inventory. For any affected unit subject to the NO<sub>x</sub> SIP Call, the Past NO<sub>x</sub> Emission Rate is the uncontrolled emission rate.
- 12. <u>Allowable Operating Hours</u> means the allowable number of hours of operation per ozone season for an affected engine or group of engines.
- 13. <u>Allowable NO<sub>x</sub> Emission Rate</u> means the allowable NO<sub>x</sub> emission rate in pounds per hour (lb/hr) during the ozone season for an affected engine or group of engines.
- 14. <u>State Air Pollution Control Board (SAPCB) Regulations</u> means 9 VAC 5 Chapters 10 through 80 and 9 VAC Chapter 170.
- 15. <u>SIP or State Implementation Plan</u> means the portion or portions of the plan, or the most recent revision thereof, which has been approved under § 110 of the federal Clean Air Act, or promulgated under § 110© of the federal Clean Air Act, or promulgated or approved pursuant to regulations promulgated under § 301(d) of the federal Clean Air Act and which implements the relevant requirements of the federal Clean Air Act.

- 16. <u>Stationary Internal Combustion Engine (IC engine)</u> means any internal combustion engine of the reciprocating type that is either attached to a foundation at a facility or is designated to be capable of being carried or moved from one location to another and remains at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a site that is intended to perform the same or similar function as the engine replaced is included in calculating the consecutive time period.
- 17. <u>VAC or 9 VAC</u> means Title 9 of the Virginia Administrative Code. This title comprises the environmental regulations for the Commonwealth of Virginia, including the State Air Pollution Control Board Regulations.

#### C. Conditions

## 1. **Application**

- a. Beginning on May 1, 2007, the owner or operator of any affected engine identified in Condition IV.C.2.a shall not operate that affected engine during the ozone season unless the owner or operator complies with the operating and emission limitation requirements set forth in this permit.
  - (9 VAC 5-80-110 and Condition III.A.1 of 1/30/07 Permit)
- b. The facility shall be operated in accordance with the terms and conditions of this permit. Any changes in the facilities subject to this permit or any existing facilities which alter the impact of the permitted facility on air quality may require a permit or permit revision.
  - (9 VAC 5-80-110 and Condition III.A.2 of 1/30/07 Permit)
- c. Except as specified in this permit, the permitted facility is to be operated as represented in the permit application dated December 1, 2005. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit or permit revisions.
  - (9 VAC 5-80-110 and Condition III.A.3 of 1/30/07 Permit)

## 2. Process Requirements

a. Affected engines subject to emission reductions of the NO<sub>x</sub> SIP Call to be operated at this facility consist of the following:

Reference ID	Manufacturer	Model Number	Horsepower
M01	Cooper-Bessemer	LSV-16SG	4,400
M02	Cooper-Bessemer	LSV-16SG	4,400
M03	Cooper-Bessemer	LSV-16SG	4,400
M04	Cooper-Bessemer	LSV-16SG	4,400

(9 VAC 5-80-110 and Condition III.B.1 of 1/30/07 Permit)

b. The NO<sub>x</sub> SIP Call Phase II emissions reduction requirements for affected engines shall be met through engine combustion modifications (high pressure fuel injection) or through operational limitations.

(9 VAC 5-80-110 and Condition III.B.2 of 1/30/07 Permit)

## 3. Periodic Monitoring

- a. The permittee shall perform periodic monitoring for the affected engines (M01-M04) to yield reliable data from the relevant time period that is representative of Transcontinental Gas Pipeline's compliance with the emission limits in Condition IV.C.4.b as follows:
  - (1) <u>Affected units operating less than 45 hours per ozone season:</u> The permittee shall maintain records on the hours of operation for each compressor engine.
  - (2) Affected units operating equal to or greater than 45 hours per ozone season: The permittee shall perform at a frequency no less than once per ozone season (or by October 30 for units where the compressor engine's operation exceeded or equaled 45 hours for the ozone season after September 1) one of the following:
    - (a) Emissions testing for NO<sub>x</sub> consistent with 40 CFR 60, Appendix A, Reference Method 7 or 7E. Tests shall be conducted and data reported in accordance with a DEQ approved testing protocol.

(b) Emissions testing for NO<sub>x</sub> using portable analyzers consistent with test methods contained in EPA Method CTM-034 or equivalent methodology as approved by the Administrator.

(9 VAC 5-80-110 and Condition III.C.1 of 1/30/07 Permit)

- b. Tests shall be conducted and data reported in accordance with DEQ-approved testing protocols. The permittee shall submit test protocols to the Director, Valley Regional Office, at least 30 days prior to testing. One copy of the results shall be submitted to the Valley Regional Office within 45 days of test completion but no later than October 31 (or by November 30 if periodic monitoring in Condition IV.C.3.a.(2) is required after September 1) of each year to document the completion of the Annual Ozone Season NO<sub>x</sub> Emissions Report detailed in Condition IV.C.6.
  - (9 VAC 5-80-110 and Condition III.C.2 of 1/30/07 Permit)
- c. In lieu of testing required in paragraph a.2., the permittee may install and operate a continuous emissions monitoring system that complies with 40 CFR Part 75.
  - (9 VAC 5-80-110 and Condition III.C.3 of 1/30/07 Permit)

#### 4. Operating/Emission Limitations

- a. Beginning on May 1, 2007, the affected engines listed in Condition IV.C.2.a. shall not operate more than a total of 1780 hours during the ozone season of any calendar year.
  - (9 VAC 5-80-110 and Condition III.D.1 of 1/30/07 Permit)
- b. Beginning on May 1, 2007, NO<sub>x</sub> emissions from the operation of each affected engine shall not exceed the limits specified below during the ozone season:

	Ozone Season	Ozone Season
Unit	Projected NO <sub>x</sub>	Projected NO <sub>x</sub>
ID	Emission Rate	Emission Rate
	(lb/hr)	(ton/ozone season)
M01	219.00	48.7275
M02	219.00	48.7275
M03	219.00	48.7275
M04	219.00	48.7275
Total		194.91

(9 VAC 5-80-110 and Condition III.D.2 of 1/30/07 Permit)

c. Requests to increase the total hours of operation of the affected facility above the limit contained in Condition IV.C.4.a. or an increase in the emission limits contained in Condition IV.C.4.b. will result in the requirement to install low emission combustion (LEC) technology on the existing affected units to ensure compliance with the ozone season NO<sub>x</sub> tonnage limit.

(9 VAC 5-40-80, 9 VAC 5-80-110, and Condition III.D.3 of 1/30/07 Permit)

d. The approved fuel for affected engines is natural gas. A change in fuels may require a NSR program permit.

(9 VAC 5-80-110 B.1 and Condition III.D.4 of 1/30/07)

#### 5. **Testing**

Prior to May 1, 2007 the permittee shall conduct an initial emissions test consistent with 40 CFR Part 60, Appendix A for NO<sub>x</sub> from each affected engine using reference method 7 or 7(E) to determine compliance with the onzone season allowable NO<sub>x</sub> emission limits contained in Condition IV.C.4.b. The tests shall be performed on each affected engine shall demonstrate compliance by May 1, 2007. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-40-30 and the test methods and procedures contained in each applicable section listed in 40 CFR Part 60, Appendix A. The details of the tests are to be arranged with the Director, Valley Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. One copy of the test results shall be submitted to the Director, Valley Regional Office within 45 days after test completion and shall conform with the test report format enclosed with the 1/30/07 Permit.

(9 VAC 5-80-110 and Condition III.E of 1/30/07 Permit)

#### 6. **Reporting**

The permittee shall submit an annual summary report to the Director, Valley Regional Office documenting the total  $NO_x$  emissions (in tons) from May 1 through September 30 of each year by October 31 from each affected engine. The report shall be submitted annually beginning in 2007. The report shall include the unit identification number for the compressor engine, the manufacturer and model of each compressor engine, and the name and address of the facility where the unit is located. Additionally, the report shall include the percent utilization at Stations 170, 175, and 180 for each ozone season.

(9 VAC 5-80-110 and Condition III.F of 1/30/07 Permit)

Permit Number: VRO40789

## 7. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. For <u>each</u> affected engine, these records shall include, but are not limited to:

- a. The number of hours each unit is operated during the ozone season compared to the ozone season allowable operating hours of operation listed in Condition IV.C.4.a.
- b. The type and quantity of fuel used during the ozone season for each affected engine.
- c. Results of all emissions tests.
- d. Periodic monitoring records necessary to demonstrate compliance with Condition IV.C.3.
- e. Calculations demonstrating compliance with the NO<sub>x</sub> emission limits listed in Condition IV.C.4.b. Alternatively, a copy of the Annual Ozone Season NO<sub>x</sub> Emissions report as required in Condition IV.C.6. may be used if the annual report contains adequate documentation to assess compliance.
- f. A summary of any corrective maintenance taken.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years. These records shall be made available to the State or EPA upon request.

(9 VAC 5-80-110 and Condition III.G. of 1/30/07 Permit)

Page 16

## V. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (9 VAC 5-80- 720 B)	Rated Capacity (9 VAC 5-80-720 C)
IA3	Vulcan VWA-25 Natural Gas-Fired	9 VAC 5-80-720 C	N/A	3.2 MM Btu/hr
IA4	Space Heater Lube Oil Storage Tank	9 VAC 5-80-720 B	VOC	11,600 gal
IA5	Piping Component Fugitive Emissions	9 VAC 5-80-720 B	VOC, HAP	N/A
IA6	Unheated Parts Washer	9 VAC 5-80-720 B	VOC	20 gal
IA7	Accessory Oil Storage Tank	9 VAC 5-80-720 B	VOC	6,000 gal
IA8	Used Oil Storage Tank	9 VAC 5-80-720 B	VOC	3,000 gal
IA9	Natural Gas Condensate Liquids Storage Tank	9 VAC 5-80-720 B	VOC, HAP	2,000 gal
IA10	Portable Natural Gas Condensate Liquids Storage Tank	9 VAC 5-80-720 B	VOC, HAP	367 gal
IA11	Lube Oil Drain & Fill Tank	9 VAC 5-80-720 B	VOC	1,400 gal
IA12	Accessory Oil Drain & Fill Tank	9 VAC 5-80-720 B	VOC	530 gal
IA13	Wastewater Storage Tank	9 VAC 5-80-720 B	VOC	8,820 gal
IA14	Jacket Water (ethylene glycol/water) Drain & Fill Tank	9 VAC 5-80-720 B	VOC, HAP	2,000 gal
IA15	Antifreeze (ethylene glycol) Storage Tank	9 VAC 5-80-720 B	VOC, HAP	2,000 gal

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

## Permit Shield & Inapplicable Requirements

VI.

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production	These standards apply to facilities that process, upgrade, or store (1) hydrocarbon liquids and (2) natural gas from the well up to and including the natural gas processing plant. Transco's Compressor Station 175 does not engage in the processing, upgrading or storage of hydrocarbon liquids. Also, Transco's Compressor Station 175 is compressing and transporting natural gas downstream of any natural gas processing plant. Since Transco's Compressor Station 175 does not contain any of the affected sources listed in 40 CFR §63.760(b), the facility is not subject to the requirements of this subpart as stated in 40 CFR §63.760(d).
40 CFR Part 63, Subpart HHH	National Emission Standards for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage	These standards apply to facilities that process, upgrade, transport, or store natural gas prior to delivery to a local distribution company (LDC) or a final end user if no LDC is present. The final standards for natural gas transmission and storage facilities require that the owner or operator of a major source of HAP reduce HAP emissions from glycol dehydration units through the application of air emission control equipment or pollution prevention measures, or a combination of both. 40 CFR §63.1270(b) states that the affected source is each glycol dehydration unit. 40 CFR §63.127(c) states that the owner or operator of a facility that does not contain an affected source, as specified in paragraph (b) of this section, is not subject to the requirements of this subpart. Transco's Compressor Station 175 does not contain any glycol dehydration units and therefore, the standards of Subpart HHH are not applicable.
40 CFR Part 63, Subpart YYYY	National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines	These standards apply to Major HAP facilities with stationary combustion turbines at a rated peak power output 1MW. Transco's Compressor Station 175 does not operate any turbines and therefore, the standards of Subpart YYYY are not applicable.
40 CFR Part 60, Subpart JJJJ	Proposed New Source Performance Standards (NSPS) and small source NESHAP for Spark Ignition IC Engines	These standards will apply to new (based on manufacture date), reconstructed, and modified spark ignition IC engines, regardless of HP rating. Transco's Compressor Station 175 does not plan to install new or reconstructed, or modify any existing, spark ignition IC engine and therefore, the standards of Subpart JJJJ are not applicable.
40 CFR Part 68	Chemical Accident Prevention Provisions	These provisions apply to a <i>stationary source</i> that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.115. Under 40 CFR §68.3 (Definitions), "the term stationary source <b>does not apply</b> to

Page 18

		transportation"; transportation includes transportation subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to Department of Transportation (DOT) under 49 U.S.C. section 60105. Transco's Compressor Station 175 is a DOT-regulated facility. Therefore, 40 CFR Part 68 does not apply to Compressor Station 175.
Clean Air Act,	Risk Management	Under Section 112(r) of the Clean Air Act, it is required that
Section 112(r)	Plans	applicable facilities develop and register a Risk Management Plan (RMP) for accidental releases. Department of Transportation (DOT)
		regulated pipeline activities are excluded from applicability of
		Section 112(r). Therefore, Section 112(r) does not apply to
		Compressor Station 175.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

#### VII. General Conditions

#### A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

#### **B.** Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II

of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

#### C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement. (9 VAC 5-80-110 F)
- 2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or

application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
  - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
  - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
    - (1) Exceedance of emissions limitations or operational restrictions;
    - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
    - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
  - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

#### D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.
- 7. One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

#### E. Permit Deviation Reporting

The permittee shall notify the Director, Valley Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

### F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Valley Regional Office by

Permit Number: VRO40789

Page 22

facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Valley Regional Office.

(9 VAC 5-20-180 C)

#### G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

#### H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

#### I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

#### J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

#### **K.** Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

### L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

#### M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

#### N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, water, or suitable chemicals on dirt roads, materials

stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90)

#### O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-40-20 E)

#### P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

#### Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

#### **R.** Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

#### S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

#### T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.

(9 VAC 5-80-160)

#### U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
  - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other

method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

- e. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- f. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

#### V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

#### W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

#### X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

#### Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for

Page 28

Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

#### Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

#### AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

#### **BB.** Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)